

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
AT MEMPHIS

HUNTER LYNN GLENN, a minor, and )  
JOHN RAGAN LANG and DANA LYNN )  
LANG, CO-GUARDIANS, )

Plaintiff, )

v. )

Civil Action No. \_\_\_\_\_

UNUM LIFE INSURANCE COMPANY OF )  
AMERICA, )

Defendant. )

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**NOTICE OF REMOVAL**

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Pursuant to 28 U.S.C. § 1441, defendant, Unum Life Insurance Company of America (“Unum”), files this Notice of Removal of this action from State Court to this Court and respectfully states as follows:

1. On June 7, 2007, plaintiff, Hunter Lynn Glenn, a minor, and John Ragan Lang and Dana Lynn Lang, Co-Guardians (collectively “Plaintiffs”), commenced an action against Unum by filing an Amended Petition in Docket No. 24,654 in the Chancery Court of Tipton County, Tennessee (“the State Court”), which Amended Petition bore the style *Hunter Lynn Glenn, a minor, and John Ragan Lang and Dana Lynn Lang, Co-Guardians v. Unum Life Insurance Company of America* (“the Civil Action”). The Civil Action is still pending in the State Court.

2. Unum was served with a copy of the Complaint in the Civil Action on June 7, 2007, and the Complaint, a copy of which is attached as Exhibit A, constitute all process, pleadings, and orders served upon Unum in the Civil Action to date.

3. Unum has, to date, made no appearance in the Civil Action in State Court.

4. The Civil Action is one of which this Court has diversity of citizenship jurisdiction pursuant to 28 U.S.C. § 1332 and removal jurisdiction pursuant to 28 U.S.C. § 1441 in that:

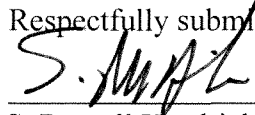
- (a) Unum, both at the time of filing of the Civil Action and as of the date of filing of this Notice, was and is a corporate citizen of the State of Maine in that it is and was incorporated in the State of Maine, with its principal place of business in Maine.
- (b) Hunter Lynn Glenn, both at the time of filing of the Civil Action and as of the date of filing this Notice, was and is a citizen of the State of Tennessee.
- (c) John Ragan Lang, both at the time of filing of the Civil Action and as of the date of filing this Notice, was and is a citizen of the State of Tennessee.
- (d) Dana Lynn Lang, both at the time of filing of the Civil Action and as of the date of filing this Notice, was and is a citizen of the State of Tennessee.
- (e) Diversity of citizenship exists between all parties properly joined in that they are citizens of different states and the amount in controversy exceeds \$75,000, exclusive of interest and costs.
- (f) This action is within the original jurisdiction of the Court pursuant to the provisions of 28 U.S.C. § 1332.

5. Unum has filed this Notice prior to the expiration of thirty (30) days following its receipt of a copy of the Complaint.

6. Unum will give written notice to plaintiff and will file a Notice of Filing of Notice of Removal with the Clerk of the United States District Court, Western District of Tennessee, at Memphis. Unum attaches a copy of the Notice of Filing of Notice of Removal as Exhibit B.

WHEREFORE, defendant, Unum Life Insurance Company of America prays that the Civil Action now pending against it in the Chancery Court of Tipton County, Tennessee, be removed therefrom to this Court.

Respectfully submitted,



S. Russell Headrick (TN5750)

Leigh M. Chiles

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*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing was served upon William Bryan Penn, attorney of Plaintiff, 100 North Main Building, Suite 1930, Memphis TN 38103, by depositing same in regular U.S. Mail, postage prepaid, this 15th day of June, 2007.



S. Russell Headrick (TN5750)